

Re Docketed

**IN THE CIRCUIT COURT, FIFTH JUDICIAL DISTRICT
PARK COUNTY, WYOMING (CODY)**

STATE OF WYOMING,
Plaintiff,

vs.

JESSE PAUL SPEER,
Defendant.

Criminal Docket No.

FILED

OCT 13 2012

CIRCUIT COURT OF FIFTH JUDICIAL DISTRICT
PARK COUNTY, WYOMING
Peggy Farnish, Clerk

By

[Signature]
Deputy

FELONY INFORMATION

COMES NOW the State of Wyoming, by and through Bryan A. Skoric, Park County and Prosecuting Attorney, and hereby informs the Court and gives the Court to understand that the above-named Defendant:

Count I: On or about October 8, 2012, in Park County, Wyoming, did unlawfully remove another from the vicinity where she was at the time of the removal, with the intent to facilitate the commission of a felony, and did not voluntarily release the victim substantially unharmed in a safe place prior to trial, in violation of Wyoming Statute §6-2-201(a)(ii)(d), a felony punishable by imprisonment for not less than twenty (20) years or life, a fine of not more than \$10,000.00, or both, AND/ OR did unlawfully remove another from the vicinity where she was at the time of the removal, with the intent to inflict bodily injury on or to terrorize the victim or another, and did not voluntarily release the victim substantially unharmed in a safe place prior to trial, in violation of Wyoming Statute §6-2-201(a)(iii)(d), a felony punishable by imprisonment for not less than twenty (20) years or life, a fine of not more than \$10,000.00, or both, contrary to the form of the Statute in such case made and provided, and against the peace and dignity of the State of Wyoming.

Count II: On or about October 8, 2012, in Park County, Wyoming, did threaten to use a drawn deadly weapon on another unless reasonably necessary in defense of his person, property or abode or to prevent serious bodily injury to another, to wit: at the Park County Complex, in violation of Wyoming Statute §6-2-502(a)(iii)(b), a felony, punishable by imprisonment for not more than ten (10) years, a fine of not more than

\$10,000.00, or both, contrary to the form of the Statute in such case made and provided, and against the peace and dignity of the State of Wyoming.

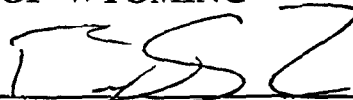
Count III: On or about October 8, 2012, in Park County, Wyoming, did use a firearm while committing a felony, to wit: Wyoming Statute § 6-2-201(a)(ii)(d) and/or § 6-2-201(a)(iii)(d), in violation of Wyoming Statute § 6-8-101(a), a felony, punishable by imprisonment for not more than ten (10) years in addition to the punishment for the underlying felony, a fine of not more than \$10,000.00, or both, contrary to the form of the Statute in such case made and provided, and against the peace and dignity of the State of Wyoming.

FOR PROBABLE CAUSE: Please see affidavit of Jonathan C. Beck, attached hereto and incorporated herein by this reference.

WHEREFORE, the undersigned prays that a warrant issue for the arrest of the above-named Defendant.

DATE: October 13th, 2012.

STATE OF WYOMING



BRYAN A. SKORIC, WSB #6-2834

Park County and Prosecuting Attorney

**IN THE CIRCUIT COURT, FIFTH JUDICIAL DISTRICT
PARK COUNTY, WYOMING (CODY)**

STATE OF WYOMING,

Criminal Docket No.

Plaintiff,

vs.

JESSE PAUL SPEER,
Defendant.

AFFIDAVIT OF PROBABLE CAUSE

**THE UNDERSIGNED, BEING FIRST DULY SWORN UPON OATH,
DEPOSES AND STATES:**

1. I, Jonathan C. Beck, am employed as the Detective Sergeant with the Cody Police Department, Cody, Park County, Wyoming.
2. The investigation has established that on October 8, 2012, at approximately 3:55 PM three female juveniles, hereinafter referred to as minor KVG, minor JJW, and minor JSW, were approached by an unknown Caucasian adult male. The suspect approached minors KVG, JJW and JSW at the exterior of the Park County Complex, located 1501 Stampede Avenue, Cody, Park County, Wyoming. The suspect advised the minors he was looking for his lost dog and asked for help in locating the dog. KVG initially offered to help him locate his dog but shortly thereafter changed her mind and said no. The unidentified male brandished a handgun, pointed the gun at KVG's chest, and motioned for her to get into the passenger side door of a white sport utility vehicle. The suspect male then drove away from the Park County Complex with the minor, KVG. JSW and JJW subsequently became alarmed, when KVG did not return, and called 911 to report the abduction of KVG.
3. At approximately 8:00 PM (MST) on October 8th, 2012, Shane Larsen and Jim Laske were returning from a hunting trip on Carter Mountain, Park County, Wyoming. As they were driving down the Carter Mountain Access Road, they observed what they initially believed to be an adult woman running in black Capri pants and a light

hooded jacket, with pink on it. As they neared the woman, they realized it was a female child, subsequently identified as KVG. KVG began to cry and told Larsen and Laske she had been kidnapped. Larsen then gave KVG his cellular phone, so she could call her mother. When KVG called her mother, Larsen and Laske over-heard KVG telling her mother that KVG had been kidnapped and assaulted by the suspect. KVG also made statements that the suspect showed KVG nude photographs of young girls. Laske contacted Cody PD and advised they came upon KVG, and requested police assistance.

4. At approximately 11:15 PM on Monday, October 8, 2012, a forensic interview of KVG was conducted at the West Park Hospital Emergency Room, located at 707 Sheridan Avenue, Cody, Wyoming. At that time, KVG advised that she was abducted and assaulted by an unknown male suspect. Ligature marks on KVG's wrists and ankles, along with a small abrasion on KVG's left lower leg were photographed. A second forensic interview was conducted on Tuesday, October 9, 2012 at approximately 10:15 a.m. at the Park County Courthouse, located at 1002 Sheridan Avenue, in Cody, Park County, Wyoming. The following is a synopsis of both interviews: On Monday, October 8, 2012, KVG walked to the library at the PCC with her brother and her brother's friend. KVG estimated that they arrived at the library at approximately 12:40 p.m. KVG met up with her friend, JSW and a girl that KVG did not know. The three (3) went to the rock bridge in front of the main entrance of the Park County Complex. KVG recalled that her brother and other kids were playing in the empty pond that runs around and beneath the bridge. A man, the male suspect which KVG described in detail as being; approximately 5 foot 8 inches to 6 foot tall, having a large stomach and being stocky, with short strawberry blonde hair and a mustache, wearing a tan baseball hat, a black shirt or coat, blue jeans, and brown framed glasses with a blue line on the side of the frames, approached the girls on the bridge and asked them if they had seen a black puppy running around. JSW told the man that she thought that she saw it running towards the recreation center. The man asked if one of the girls wanted to go with him to help look for the puppy. JSW said, "No"; KVG told the man, "Okay", then decided that she did not want to and said, "No". KVG stated that the man pulled a handgun out of his back pocket, pointed it at her chest, then towards his car which was parked nearby. The man

did not say anything, but KVG understood that the male was directing her to get into the vehicle. KVG does not think that the other girls saw the gun because they were facing away and talking. KVG got into the passenger side of the vehicle. The suspect drove KVG possibly westbound to what KVG thought was a bank. KVG told the man that he could turn around because it did not look like they were going to find the dog. The man parked the car and pulled a bundle of rope from the back seat area and tied KVG hands behind her back. The man told KVG to put her head down. KVG told the man no. The man then hit KVG on the back of her head with part of the gun. KVG kept her head up, or had her head partially up as they drove. KVG described driving west on Yellowstone Avenue out of town. KVG repeatedly asked the man to turn the vehicle around. The man repeatedly told KVG that he knew a better way back into town. KVG told the man that she knew that he was going to rape her. The man told KVG that he was not going to hurt her. KVG described turning South onto the South Fork Road out of town. KVG recalled driving past houses and farm houses and up into the mountains where there were lots of trees and snow on the ground. The man pulled off of the road and stopped the car. The man then assaulted KVG. KVG advised that she saw stacks of photographs of naked young girls during the assault. After the assault the man put a cloth bag over KVG's head, obstructing her view. KVG recalled hearing a metallic clunking sound and what sounded like a plastic trash can hitting the ground. The man then drove away from that area. KVG remembered that the road was bumpy and she was tossed around in the back of the vehicle as they were driving. KVG remembered feeling like they were driving in circles. The man drove for a while then stopped and exited the car. At some point the man took the ropes off of KVG. The man got KVG out of the back of the vehicle and walked KVG some distance away from the vehicle. The man then told KVG to count to fifty (50) before she turned around. KVG heard the man walk away towards the direction that they came from. When KVG opened her eyes she could see that they had traveled down from where there were trees. KVG could see sagebrush and what she described as a "desert" area. KVG turned around and walked to the gravel road. KVG walked down the gravel road for what she estimated was ten (10) minutes, before she was picked up by hunters.

5. On October 9th, 2012, after the interview of KVG, KVG and her mother, accompanied investigators, to show them the route the suspect took KVG and attempt to locate the area of where the suspect took KVG on October 8th, 2012. KVG first directed the investigators out of the parking area of the Park County Complex, west on the access road from the library, to Heart Mountain Street. From there KVG directed the investigators to turn north and then into the Mormon Church parking lot, at 1407 Heart Mountain Street. KVG described to the investigators that the suspect pulled into the back of the parking lot on the north east side of the church, where he stopped and parked. KVG stated the suspect then bound KVG's hands behind her back with a yellow rope. The suspect then told KVG to put her head down. KVG went on to say that when she did not comply, the suspect struck her on the back of the head with the handgun.

6. After being bound, KVG reported the suspect drove out of the church parking lot and headed north, down the hill on Heart Mountain Street. KVG then took investigators on a path, which led investigators out to 8th Street and then out to Yellowstone Avenue, where they were directed out the South Fork Highway. While traveling out the South Fork Highway, KVG directed investigators to turn onto County Road 6NQ, where she stated the suspect was lost. KVG further stated the suspect was looking at a map as he drove, which he described as a book map. KVG took investigators down 6NQ to a location where the road hit private property. This location was at the end of a dead end road where there were two farmers or ranchers working in an adjacent field. KVG was certain these ranchers or farmers saw the vehicle. The suspect then turned around and eventually turned onto a road next to a canal, a two track dirt road, where the suspect again turned around, eventually going back out to the South Fork Road. KVG then directed investigators to the Carter Mountain Access Road.

7. Once on the Carter Mountain Access Road, KVG directed investigators to drive up the road, to the National Forest, where the tree line started. While on the forest, there were several locations that KVG thought looked familiar, but she could not be certain of the exact location where the assault occurred.

8. On October 10, 2012, the ranchers mentioned by KVG were located and interviewed by law enforcement and confirmed seeing a white SUV at the time described by KVG.

9. On October 10th, 2012, two juvenile male witnesses, who were hunting on Carter Mountain on the afternoon of October 8th, 2012, were identified and interviewed at the Cody High School, located at 1225 10th Street, Cody, Wyoming. Those two witnesses, referred to as MMS and CCS, both advised they were in fact on Carter Mountain on October 8th, 2012, in the afternoon and evening hours. MMS and CCS both stated they recalled seeing a white SUV that they described as being a Nissan Xterra. Specifically, they stated they believed the vehicle had Montana plates on it and they took notice of the vehicle because it had quickly turned out front of them, onto the main road on Carter Mountain and sped off quickly. MMS and CCS stated the vehicle came off of a secondary road, which they described as the second road to the left, after going across the cattle guard. Further they described the road has a gate on it, but the gate is open. MMS and CCS both stated the vehicle had Montana plates on it. MMS and CCS both stated the plate on the vehicle had a blue background, with white lettering, and the Montana state outline, which is how they were able to determine the plates were from Montana. When specifically asked if the vehicle had anything on the roof of the vehicle, MMS and CCS both stated they were sure that it did not.

10. During the investigation, multiple Cody, Wyoming local businesses and entities provided video surveillance footage to assist investigators. Federal and state investigators reviewed and analyzed the footage and placed a white SUV, with a grey and black Thule cargo box mounted on the vehicle roof, in the vicinity where KVG was approached and abducted. Further review of video surveillance from locations along the route the suspect would have traveled from where he abducted KVG to where he assaulted KVG was done by investigators. This review of video revealed several places along the route where the suspected vehicle was captured on surveillance video. The time stamps on the surveillance videos which captured the suspected vehicle were consistent with the required travel times and the investigators are confident that this was

in fact the suspect vehicle. Surveillance video from numerous locations in Cody, WY, for times prior to the abduction was also reviewed to identify locations where the suspect was observed prior to the abduction.

11. Still images of the suspect vehicle were printed from the surveillance video and officials with Toyota Motors Corporation, in San Antonio, Texas, were consulted regarding the make and model of the vehicle. Toyota officials advised that the suspect vehicle appeared to be a Toyota 4-Runner SR5 from the 2003 – 2005 model years.

12. On October 11, 2012, the two previously mentioned local ranchers, Gary Lee Boggiamo and Clayton Roger Peterson, who advised they saw a white sport utility vehicle traveling in the vicinity of where KVG was sexually assaulted were shown a photograph of the suspect vehicle, now known to be a white Toyota 4Runner bearing the grey and black Thule luggage bin. Boggiamo and Peterson positively identified it as the vehicle they saw at the time KVG described.

13. On October 11, 2012, Justin Peters, a commercial logger, who was working on Carter Mountain, reported he discovered an abandoned cargo box, on the second road to the left, after driving through Saw Mill Park, off of the main road on Carter Mountain. Peters reported this discovery to law enforcement authorities. Subsequent investigation by law enforcement authorities determined the item to be a Thule brand roof mounted cargo box, which is grey on the top and black on the bottom. The location of the Thule cargo box was in the area KVG identified as the location where she was assaulted on October 8th, 2012, and also on the road where MMS and CCS observed the white SUV around 1815 to 1830 hours. A comparison of this item with the cargo box observed in surveillance videos showed the abandoned cargo box appears to be identical to the cargo box observed on the suspect white Toyota 4Runner SR5. Based on the victim's statement, it is believed that the loud noise she heard subsequent to the assault and while her head was covered, was the suspect removing the Thule luggage bin from his vehicle. Based on investigative experience and the fact that the luggage bin was relatively new in its condition, it is believed that suspect removed the luggage bin from his vehicle to alter

the appearance of his vehicle in the event a description of his vehicle bearing the Thule cargo box had already been provided to law enforcement.

14. On October 12, 2012, an FBI (sketch artist) worked with KVG to create a composite sketch of the suspects face, based on KVG's observations of the suspect.

15. On October 12, 2012, investigators reviewing surveillance video from the Maverick store located at 1802 17th Street in Cody, WY, observed the suspect vehicle on surveillance video recorded at approximately 12:55 PM (MST) on October 8, 2012. While the vehicle is observed entering and exiting the parking lot of the Maverick, the location where the vehicle parked cannot be seen, nor can a person associated with the vehicle be seen.

16. On October 12, 2012, investigators reviewed surveillance video from the Albertson's store located at 1825 17th Street, Cody, Wyoming. The Albertson's store is located across 17th Street from the Maverick store mentioned above. Surveillance video recorded at the Albertson's store between 12:54 and 12:57 PM (MST) on October 8th, 2012, shows the suspect vehicle park near the Maverick store, in front of Rocky Mountain Discount Liquors, located at 1820 17th Street, Cody, Wyoming. That video further shows a person walk to and from the vehicle, entering and exiting Rocky Mountain Discount Liquors store, before departing the Maverick store parking lot at approximately 12:57 PM. The male suspect in that video is wearing a blue or black jacket, with a light colored shirt, a tan baseball hat, and eye glasses with dark frames.

17. On October 13, 2012, an FBI Special Agent (SA) reviewing the video recorded by surveillance cameras at the north entrance to Yellowstone National Park observed the above described suspect vehicle entering the park on October 7th, 2012, at approximately 4:00 P.M. The FBI SA observed the vehicle was a white Toyota 4Runner, had a Montana license plate of 6-26712A, and had a Thule cargo box on the top of the vehicle. Further, the FBI SA observed the driver was a Caucasian male wearing eye glasses, a tan hat, and a blue or black jacket.

18. On the same date, October 13th, 2012, an FBI SA reviewed the video surveillance at the northeast gate of Yellowstone National Park observed a recorded video of a white Toyota 4-Runner sport utility vehicle leaving the park on October 7, 2012, at approximately 5:20 PM. The FBI SA observed that this vehicle was white in color and had a cargo box mounted on top. The FBI SA had previously seen images of the suspect vehicle described above as well, and the Thule cargo box which was recovered from Carter Mountain. The FBI SA observing the Yellowstone Nation Park surveillance video, identified that the vehicle in the video appeared to be identical to the suspect vehicle in Cody on October 8th, 2012. The surveillance video also captured the license plate on this vehicle. This license place was observed to be a license plate issued by the State of Montana bearing number 6-26712A. This information was provided to the command post at the Cody Police Department at approximately 11:07 AM.

19. On October 13, 2012, a query of the Montana Department of Motor Vehicles database was conducted for the Montana license plate number 6-26712A. The results of this query were that the Montana license plate is assigned to a 2004 Toyota 4-Runner registered to a Jesse Paul Speer.

20. On October 13, 2012, a query of the Montana Driver's License Division revealed Montana Driver's License is assigned to Jesse Paul Speer, date of birth [REDACTED], home address [REDACTED]. The Montana Driver's License record describes Speer as 5'11" in height, 190 pounds, and having blue eyes. The photograph associated with this Speer's license depicts a white male with glasses and facial hair. Further, Speer's hair color is not listed, but his hair color is strawberry blonde in appearance.

21. On October 13, 2012, the driver's license photo for Jesse Paul Speer was compared with the artist's rendering of the suspect created on October 12, 2012. The driver's license photograph of Speer and the artist's rendering resemble each other.

22. On October 13, 2012, the driver's license photograph for Jesse Paul Speer and the image of the suspect recorded on the surveillance video at Rocky Mountain Discount Liquors on October 8, 2012 were compared. The suspect captured on the

surveillance video at Rocky Mountain Discount Liquor appears to be same person, as depicted on the driver's license photograph of Speer.

23. On October 13th, 2012, at approximately 5:30 P.M., the described vehicle, a white Toyota 4runner, bearing Montana 6-26712A plates was observed in Belgrade, Montana. The vehicle was subsequently stopped and Speer was detained. At the time of the stop, the vehicle no longer had the Thule cargo box, which was observed in the video from Speer entering and exiting the Yellowstone Nation Park on October 7th, 2012. At the time Speer was detained, photographs of Speer were taken and forwarded to the command post in Cody. I personally observed the photographs of Speer and observed he is wearing a blue jacket and glasses that appear to be the same as the suspect in the Rocky Mountain Discount Liquor video surveillance from the date of the abduction and assault on October 8th, 2012, in Cody, Park County, Wyoming. Further, I observed the glasses are brown, as KVG described in her interviews, and they have a blue line in the side of the frames, as she described.

24. All of the above-described events occurred in Park County, Wyoming.

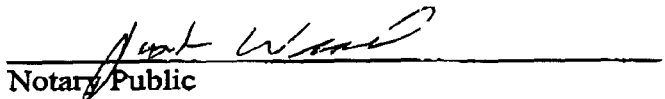
25. The foregoing statement is accurate to the best information available to me as of the date of this Affidavit. Investigation of the matter may not be completed, and the foregoing is not to be construed as a statement of all information pertinent to the charge(s) which may be brought in this matter.

DATED: October 13th, 2012.



STATE OF WYOMING)
) ss
COUNTY OF PARK)

The foregoing Affidavit of Probable Cause was sworn to and signed before me personally by JONATHAN C. BECK on October 13th, 2012.


Notary Public

My commission expires: _____

